

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TROY LAMONT MOORE, SR., : CIVIL ACTION NO. 14-3873  
Plaintiff  
  
v. :  
  
JUDGE EDUARDO C. ROBRENO  
  
LOUIS GIOLA, et al., :  
Defendants

**FILED**

MAR 27 2015

MICHAEL E. KUNZ, Clerk  
By \_\_\_\_\_ Dep. Clerk

PLAINTIFF'S BRIEF IN SUPPORT FOR MOTION FOR SANCTIONS

Plaintiff, Troy Moore, a state inmate brought this civil rights action against Defendants Louis Giorla, Major Martin, Corrections Officer Walden and R.N., Medical Nurse McGrogan for violating his constitutional rights.

The defendants has failed to comply to subpoenas he served to appear for a deposition. The plaintiff family was attempting to hire Sargent's Court Reporting Service, Inc. 210 Main Street. Johnstown, Pa 15901.

ARGUMENT

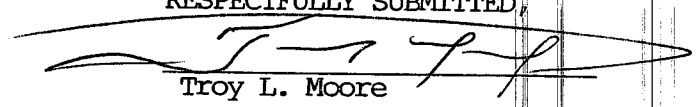
The plaintiff has suffered an irreparable injury by defendants attorneys instructing defendants not to comply to plaintiff's subpoenas that was served. The defendants testimony was pertinent to plaintiff's claims to support the violation of his constitutional rights in damages. The Court has scheduled a telephone status and scheduling conference that will be held on Monday, April 6, 2015 at 11:00 a.m. In accordance with the Court's December 3, 2014, Scheduling Order (ECF No. 16), the purpose of this conference is to provide plaintiff with an opportunity to identify discovery needs and to make requests in order to allow plaintiff to respond to Defendants Motion for Summary Judgment (EFC No. 21).

SOUGHT OF RELIEF

WHEREFORE, plaintiff seeks in sanctions for relief as to the following:

(1) Defendant Commission Louis Giorla in the amount of \$2,500.00, (2) Defendant Major Martin in the amount of \$2,500.00, (3) Defendant Margaret McGrogan, RN., in the amount of \$2,500.00 and (4) Defendants in the amount of \$900.00 for failing to comply to plaintiff's demand to receive sanctions for damages to ne granted a video conference hearing on Monday, April 6, 2015 at 11:00 a.m.

RESPECTFULLY SUBMITTED,



Troy L. Moore

FE-2483

SCI-Forest

P.O. Box 945

Mrienville, Pa 16239

Dated: 3-22-15

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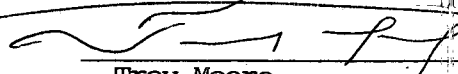
CERTIFICATE OF SERVICE

I, Troy Moore, hereby certify that on March 22, 2015, I caused to be served a true and correct copy of the foregoing document titled Brief In Support for Motion for Sanctions to the following:

Alan S. Gold  
Attorney for Defendant  
Margaret Mc Grogan, Rn  
261 Old York Road  
Suite 526  
Jenkintown, Pa 19046

Aaron Shotland, Esquire  
City of Philadelphia Law Department  
Civil Rights Unit  
14th Floor  
1515 Arch Street  
Philadelphia, Pa 19102

RESPECTFULLY SUBMITTED,



Troy Moore  
FE-2483  
SCI-Forest  
P.O. Box 945  
Marienville, Pa 16239

**FILED**

MAR 27 2015

By MICHAEL E. KUNZ, Clerk  
Dep. Clerk

Inmate Name TROY L. MOORE SR. DC# FE2483  
Housing Unit: AB2063  
SCI Forest  
PO Box 945  
Marienville, PA 16239

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MAIL

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